

W.K., et al v. Red Roof Inns, Inc., et al

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B.,
D.P., A.F., C.A., R.K. and K.P.,

Plaintiffs,

vs.

CIVIL ACTION NO.:

1:20-CV-05263-MHC

RED ROOF INNS, INC.; FMW RRI
NC, LLC; RED ROOF FRANCHISING,
LLC; RRI WEST MANAGEMENT, LLC;
VAHARI HOTEL, LLC; WESTMONT
HOSPITALITY GROUP, INC.;
and RRI III, LLC,

Defendants.

VOLUME I

VIDEOTAPED DEPOSITION OF JANE DOE 2

June 16, 2022

9:42 a.m.

1960 Satellite Boulevard, Suite 4000

Duluth, Georgia

Carolyn M. Carboni, RPR, RMR, CCR-B-878

Leo Mileman, Videographer

PL Sum. J.**Ex. 003**

W.K., et al v. Red Roof Inns, Inc., et al

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1 APPEARANCES OF COUNSEL:

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3 Roof Inns, et al. case:

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12 Westmont Hospitality Group, et al. case:

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5 Inc.; and RRI III, LLC:

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21 Also Present:

22 Jennifer Webster

23 Beth Richardson (via Zoom)

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12 Westmont Hospitality Group, et al. case:

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24

25

1 A Smitty.

2 Q Smitty, S-m-i-t-t-y?

3 A Uh-huh.

4 Q Okay. Did you use heroin in your hotel
5 room last night?

6 A No.

7 Q Okay. So what -- you were allegedly
8 trafficked from 2011 to 2014, correct?

9 A Yes, ma'am.

10 Q In which hotels did that trafficking
11 occur?

12 A So from 2011 to 2014 -- my trafficking
13 started in 2011, but the trafficking in Georgia
14 started from 2013 to 2014, so there's --

15 Q So where was the first time, regardless of
16 in Georgia or not, where was the first time?

17 A In California, in Sacramento, California,
18 and it wasn't in a hotel. It was at a restaurant
19 where a guy had took me to meet a date.

20 Q Okay. And we're going to get into all of
21 this in more detail later. I'm just trying to get
22 a, you know, general overview right now.

23 A Sure.

24 Q So what brought you to Atlanta in 2011?

25 A My dad, he moved out here when I was

1 younger. My parents have been divorced since I was
2 six. So I just wanted to live with my dad.

3 Q How old were you in 2011?

4 A Give or take, 20, 19, somewhere around
5 there.

6 Q And who are your alleged traffickers?

7 A All of them from California to now?

8 Q Uh-huh.

9 A A man named Xavier, and then there is a
10 man by the name of CB, a man by the name of Kwan,
11 another man by the name of Diablo, a girl that went
12 by the nickname Black, and another one named [REDACTED]
13 [REDACTED], a gentleman named [REDACTED], and [REDACTED]
14 [REDACTED].

15 Q Do you recall the first time you were at a
16 Red Roof Inns?

17 A I'm sorry?

18 Q Do you recall the first time you were at a
19 Red Roof hotel?

20 A Do I remember?

21 Q Uh-huh.

22 A Yes.

23 Q When was that?

24 A Sometime around 2013.

25 Q What did you do to prepare for this

1 deposition today?

2 A Looked over some binders of notes that my
3 lawyer had prepped for me, my other deposition,
4 interrogatory notes, stuff like that.

5 Q Okay. Other than your attorneys, did you
6 speak with anyone about this deposition today?

7 A No.

8 Q How many times did you meet with your
9 attorneys in preparation for this deposition?

10 A All week this week.

11 Q How long were those sessions generally?

12 A Two, three hours.

13 Q Do you know any of the other plaintiffs in
14 this case?

15 A A couple.

16 Q Who are they?

17 A Jane Doe 2 is actually really close to me.
18 She's like a sister to me. She was there basically
19 throughout the entire trafficking.

20 Q What's her name?

21 A [REDACTED].

22 Q Okay. I believe that's Jane Doe 1.

23 A Yes.

24 Q You're Jane Doe 2, correct?

25 A Yes.

1 said, I don't know his real name.

2 Q Okay. Did you write this response,
3 Mr. Wright?

4 A No. My lawyers prepared this.

5 Q Okay. So Bagz was one of your
6 traffickers, correct?

7 A Yes, ma'am.

8 Q How did you first meet him?

9 A So there was a group of these traffickers
10 that were in a group called PIVIP. The guy that I
11 was first trafficked by, CB, was how I met all
12 of -- all of them.

13 Q Okay. So he was like a member of this
14 group PIVIP?

15 A It would be Bagz, Big E was an associate
16 of CB who was not a full member, but he was there
17 all the time with them. And he talked about it
18 promoted them because they did music and stuff like
19 that, Diablo, Tricky, Nitty and Kwan.

20 Q Okay. So this was -- could you explain
21 more what PIVIP is?

22 A PIVIP stands for Pimps in Very Important
23 Places. And Bagz, to my knowledge, actually has an
24 LLC under that name.

25 Q Okay. And they do music, you said?

1 Sorry.

2 A Her phone.

3 Q Okay. And when was the last time you
4 spoke with Black?

5 A The last time that she actually and I
6 spoke was when Kwan had made me go with her for
7 about a week with her and her boyfriend that at the
8 time was Diablo, who was also a member of PIVIP.

9 She and I went to Greenville, South
10 Carolina, where she then had me at a hotel for
11 about a week and was making me do dates out of
12 there for her. After that, when I got dropped off,
13 that was the last time I seen her.

14 Q When was that --

15 A Sometime --

16 Q -- about?

17 A -- between 2013 and 2014. Like I said,
18 it's really hard for me to remember exact months
19 and dates.

20 Q Yeah.

21 A I can remember events and like, you know,
22 what happened with the events, but it's hard for me
23 to kind of put those in order.

24 Q Sure. The next one says Diablo that was
25 also one of your traffickers. How did you -- how

1 A We walked down Metropolitan Parkway, and
2 the only person that we could think of to call was
3 our drug dealer because at the time, we were going
4 through severe heroin withdrawals, and that's all
5 we could think of was getting -- you know, to take
6 away our withdrawals. So we called him to pick us
7 up.

8 Q Did you go back into trafficking after you
9 left that rehab facility?

10 A It did happen, yes, but it wasn't
11 something that I chose to happen. It just -- the
12 guy that picked us up knew our traffickers and he
13 took us back to him.

14 Q Okay. The next one is [REDACTED],
15 a/k/a Ant.

16 A Yes.

17 Q He was a sex trafficker as well, true?

18 A Yes, ma'am.

19 Q Was he yours or no?

20 A That's a complicated question. So [REDACTED]
21 [REDACTED] was associated with Kwan. He was there a
22 lot during the sex trafficking. And then shortly
23 later, one of the girls that was trafficked with
24 us, her name is [REDACTED], that ended up
25 becoming his one and only, like, main girl that he

1 had trafficked. And there were times where Kwan
2 would drop me off to Ant and [REDACTED] to work out of
3 their rooms because I couldn't go with him if he
4 had to maybe deal with some family stuff or
5 whatever.

6 And then basically I would have to give
7 half the money that I made to Ant for Kwan, and
8 then give the other money to Kwan, because I was
9 using their room to work out of.

10 Q Okay. So maybe indirectly he was a
11 trafficker of yours?

12 A Yes, ma'am.

13 Q Okay. The next name -- when was the last
14 time you were in contact with [REDACTED]?

15 A The last time I went to the Red Roof to
16 see him and [REDACTED].

17 Q When was that?

18 A Sometime in 2014.

19 Q And when was the last time you were in
20 contact with Ms. Bailey? Sorry, I skipped that
21 question.

22 A I talk to Ms. Kasey and Ms. Bailey as much
23 as possible. Ms. Bailey and I haven't spoken since
24 a Christmas gathering last year at Ms. Kasey's
25 church in Conyers.

1 Q At Christmastime, you said?

2 A Uh-huh.

3 Q Is Ms. Bailey the one that kind of taught
4 you about the term "sex trafficking"?

5 A Oh, no, ma'am. I've known about the term
6 "sex trafficking" since I was a young girl.

7 Q And how did you learn about what sex
8 trafficking was?

9 A Documentaries, movies, hearing about it on
10 the news.

11 Q Okay. The next name is [REDACTED].
12 Oh, wait, I'm sorry, we just did that one.

13 [REDACTED] is a victim of sex
14 trafficking. How do you know [REDACTED]?

15 A I met [REDACTED] briefly a couple of times
16 when I was transferred from CB to Kwan to Bagz.
17 Basically, that group of PIVIP, they would pass the
18 girls around. And so for about a week, I was
19 trafficked by Bagz. And [REDACTED] was one of his
20 main traffickers. And it didn't really work out
21 with Bagz. He didn't like, I guess, me or
22 something like that, so he sent me back to Kwan.

23 Q Okay. And [REDACTED] was with Bagz; is
24 that true?

25 A Yes.

1 treated really nice by him and that he -- she was
2 grateful for, you know, to stay with him because of
3 how terrible it was having to, you know, deal with
4 the sex trafficking, and he did not make her do
5 that.

6 Q The next name is Forrest Castille. How
7 did you meet Forrest?

8 A He was an employee at the Red Roof Smyrna
9 Inn. I first met him when I was staying with [REDACTED]
10 [REDACTED] and [REDACTED] during my stay there when
11 Kwan would drop me off.

12 Q Did you speak with Mr. Castille?

13 A I'm sorry. Excuse me.

14 Q That's okay.

15 A Yes, I did.

16 Q Okay. What was that conversation?

17 A I spoke to him and asked him if he -- if
18 he knew what was going on as far as the trafficking
19 goes, and if he had any knowledge that these girls
20 were actually not there willingly and against their
21 will.

22 And he kind of didn't really understand
23 what I -- what I meant by that.

24 So I kind of stepped aside when we were --
25 I went outside to go smoke a cigarette, and I

1 pulled him aside where, you know, Ant and [REDACTED]
2 couldn't hear me. And I told him, I said, "Look,
3 we're not here willingly, and I know that you have
4 a lot of involvement in this. You know, I've heard
5 your conversations with Ant and what's going on,
6 and I'm just -- I want to let you know you're a
7 little in over your head. And I think if you
8 really knew what was going on, you wouldn't be
9 doing what you're doing. But I'm just saying I
10 think you should be careful and maybe really kind
11 of look at things before you continue on because I
12 don't think you want to get involved in this."

13 Q You said he was involved and you'd
14 overheard conversations. What was his involvement?

15 A To my knowledge, what they spoke about was
16 how he would organize different areas for the guys
17 that were trafficking or maybe drug dealing out of
18 the hotel, and he would put them into specific
19 locations, maybe like rival gangs, not close to
20 each other and, you know, so they weren't close to
21 each other and whatnot, to put the traffickers in
22 rooms where it would be easy not to be seen as
23 much.

24 I've even one time heard him say -- heard
25 that he gave them discounts on rooms and stuff like

1 that. And I have actually seen Ant and Forrest
2 exchange money for that. And he also gave them
3 security awarement of law enforcement.

4 He would call Ant and say, "Hey, cops are
5 coming, lay low for a minute." And then later on,
6 call back, "Okay, we're all good, you can continue
7 on."

8 Q You said he was taking money from them,
9 from the traffickers?

10 A Yes, ma'am.

11 Q What was the money for?

12 A For payment for security and basically
13 just help at that location.

14 Q Did you see him do that, exchange money?

15 A Yes, ma'am.

16 Q When was that? Where was that?

17 A One of the few times that I stayed there
18 at the Red Roof with [REDACTED] and Ant, I witnessed it
19 about a good three times myself.

20 Q Would that be, like, in the lobby, in a
21 room?

22 A No, inside of Ant's room.

23 Q Should he have called the police, you
24 think, when you were telling him, you know, we're
25 not here voluntarily?

1 client.

2 MR. ALLUSHI: She can still answer it if
3 it's not through your advice or through your
4 conversations, Jon, if she knows.

5 MR. TONGE: I'm advising you not to answer
6 that question.

7 THE WITNESS: Yes, sir.

8 MS. FENNELLY: Okay.

9 MR. ALLUSHI: You're going to instruct her
10 not to answer?

11 MR. TONGE: Yes.

12 MR. ALLUSHI: Okay. Are you taking his
13 advice, ma'am?

14 THE WITNESS: It's my lawyer. Of course.

15 BY MS. FENNELLY:

16 Q The next name is [REDACTED] a/k/a CB,
17 which this was your first trafficker in Georgia,
18 correct?

19 A Yes, ma'am.

20 Q Tell me about the first time you met CB.

21 A The first time I met CB I was at a
22 Microtel off of Buford Highway. I'm waiting on a
23 drug dealer at the time to drop off something to
24 me, and I was sitting outside the hotel.

25 There was a girl there that we were

1 sitting next to each other. She was smoking a
2 cigarette. And she asked me what I was there for.
3 I told her. And I had been sitting out there for
4 quite some time, so she invited me up to her room.

5 When I walked with her up to her room and
6 walked in the door, she failed to tell me that she
7 had other people up there. Well, when I walked in
8 the door, those two men were CB and Big E. And
9 after walking in there and was kind of shocked
10 because I probably wouldn't have went up there
11 knowing there were other people up there, I thought
12 it was just her, CB had then pulled me aside into
13 the bathroom and began to explain to me about what
14 they were there doing.

15 He said that the girl was doing dinner
16 dates with men for money; that they didn't exchange
17 sex or anything like that. Because I did ask him,
18 I said, "Well, this sounds like prostitution,
19 right? I mean, it's like escorting, isn't it?"

20 And he said, "Oh, no, no, no. Like they
21 don't -- they don't force you to do anything that
22 they don't want you to do, you know. I'm basically
23 there just to make sure these guys don't get handsy
24 or anything like that. And, you know, we make a
25 lot of money. They're basically old men that maybe

1 are lonely, lost wives or just want, you know, the
2 company of a pretty woman."

3 And he was like, "Would you be interested
4 in maybe meeting some of them, because they've
5 asked us if we have any other girls that we could
6 bring along."

7 And I told him -- I told him, I said,
8 "Well, I mean, that sounds like what it isn't. You
9 know, like, I mean, are you sure this isn't like --
10 you know, somewhere I would be in a situation where
11 they're going to try to have sex with me?"

12 And he said, "Absolutely not. That's why
13 I'm here. I'm here to make sure that doesn't
14 happen. So if you'd like to maybe accompany her on
15 a dinner date one night, you know, and see what
16 it's about, you know, we can take you."

17 He said, "Actually, the date she's
18 supposed to meet tomorrow asked if he could go on a
19 double date because he's going to bring his friend
20 and we can't find another girl to do it. You know,
21 I could pay you like \$100 or so to do it."

22 And I said, "Well, I mean, yeah, that
23 sounds -- that would be nice, if it's just dinner,
24 you know, I would be interested in that."

25 Later on that night, there was a phone

1 conversation between CB and someone that I
2 understood after just listening to be an
3 ex-boyfriend of the girl that was in the room with
4 him. And they talked about how he, from my
5 understanding, was going to be sending money
6 through Western Union transfer to then buy the
7 girl's, I guess, freedom back from CB so she
8 wouldn't have to work for him anymore.

9 And when I overheard this, I was kind of
10 confused, you know. So she then got really upset
11 and said that why should -- you know, she should
12 not have a say in it and that she doesn't want to
13 go, it should be her choice whether or not she
14 stays. Excuse me.

15 And then CB told her that it was just
16 business and that to pack her things and she would
17 then be dropped off at her grandmother's.

18 Well, when that happened, and I heard that
19 he was getting ready to drop her off, I had been at
20 the hotel for quite some time, it was getting dark
21 now -- and when I left my house, I basically just
22 got on the bus and left to go meet my dealer. I
23 didn't even tell my family I was leaving. They
24 were away at work that day.

25 And I asked him if he would give me a ride

1 home because I didn't have a car. I didn't have
2 money to pay for a taxi or get back on the bus
3 again.

4 So he said, "Oh, yeah, no problem."

5 And I asked if he wouldn't mind dropping
6 me off first because I was closer to -- my
7 grandmother's -- my parents was closer than her
8 grandmother's were.

9 He said that was fine.

10 Well, when we got in the car and we drove,
11 we ended up driving to drop her off first. And
12 when she got out of the car, I kind of sat there
13 and thought to myself, like, how did I get in this
14 situation? Something doesn't feel right.

15 And I then spoke to CB, and I told him, I
16 said, "Well, you know, if she's not going to be
17 here to assist me on the dinner date tomorrow, I'm
18 not sure that I want to go because, you know, who
19 am I going to go with now?"

20 You know, I was really doing it because I
21 was -- I felt comfortable with her to go.

22 He then -- I didn't know that he even had
23 a gun -- pulled a pistol from his waistband, turned
24 around so fast that he whipped me in the head with
25 his pistol. And all I can remember him saying is,

1 "Bitch, you're not going anywhere." And then I
2 later on that next morning woke up at the Suburban
3 Extended Stay hotel.

4 THE REPORTER: At what hotel?

5 THE WITNESS: The Suburban Extended Stay.

6 BY MS. FENNELLY:

7 Q Okay. Why were you at the hotel to begin
8 with where you first met them?

9 A The Microtel that I mentioned?

10 Q Where you said you were waiting for
11 someone and then you met the girl so --

12 A Yeah, I was waiting on a drug dealer to
13 bring me some drugs.

14 Q Okay. And then why did you decide to go
15 to a hotel room with a stranger?

16 A I didn't go with a stranger. I was there
17 to meet my drug dealer who I knew personally for
18 quite some time. I was sitting outside for three
19 hours waiting on him, and there was a girl smoking
20 a cigarette.

21 I make new friends all the time that are
22 strangers that become my friends. And she invited
23 me up to her room. I thought she was by herself
24 and didn't want to wait outside anymore, so I went
25 up there. She failed to tell me that there were

1 you hostage and get kidnapped. That was not my
2 responsibility. It was their responsibility to do
3 the right thing and to not kidnap me and not take
4 me home.

5 Q But you got in the car with strangers at a
6 hotel in the middle of the night, correct?

7 A Yes.

8 Q Okay. And then you said you were knocked
9 out with a pistol; is that correct?

10 A Yes, ma'am.

11 Q Did that, like, leave a bruise?

12 A It did.

13 Q How long were you asleep for?

14 A I'm not sure.

15 Q Okay. We'll come back to this a little
16 more later, but I'm going to keep going down this
17 list.

18 The next name is -- actually, when was the
19 last time you saw CB?

20 A When I was exchanged from CB to Kwan, that
21 was the last time I seen him.

22 Q Which was 2013, 2014?

23 A 2013, 2014, yeah.

24 Q The next name is [REDACTED] a/k/a
25 Kwan, who was also one of your traffickers. When

1 was the first time you met Kwan?

2 A So me and Jane Doe 1, [REDACTED], were
3 staying at the Comfort Inn on the Doraville side of
4 Buford Highway. And there was a situation that day
5 where -- one of the ways that the traffickers would
6 take our vulnerability and just control us was with
7 our addiction. And since we were addicted to
8 heroin, they used that to, you know, make us be
9 able to do things that they wanted.

10 When you don't have heroin, you go through
11 severe, severe withdrawal that make you basically
12 feel like you have the flu and that you're dying.
13 I mean, you can't die from it. You can have
14 seizures, but it's not one of the drugs that you
15 can actually die from, like alcohol or something
16 like that.

17 I woke up that morning severely ill and
18 could not get out of bed. And so I walked next
19 door to the room where Big E and CB were, just
20 knocked on the door to tell them that I needed
21 something so I could get ready for the day.

22 To my surprise, I didn't know that he was
23 gone, CB was gone. Big E was there by himself.
24 And I asked him if I could get something, and he
25 said I had to call CB first.

1 Q I'm sorry. I'm just going to interrupt
2 quickly. When you say "get something," you're
3 referring to drugs, correct?

4 A Yes, ma'am.

5 Q Okay.

6 A He made me call CB to then ask him if that
7 was okay because he didn't want to do it without
8 his permission. And I called him and he told me
9 that I needed to just suck it up and wait till he
10 got back; that when he got back, he would give me
11 something to get well, and until then, just shower,
12 get ready, and be ready for dates when he got back.

13 I tried to explain to him that I was too
14 sick to do that and that I needed something now and
15 I could not wait. And he told me the same thing
16 and then hung up on me.

17 So I then later just told Big E that he
18 said yes. And I tried to take the smallest amount
19 that I didn't think he would even notice. And when
20 he got back, he noticed, and then that was the
21 first time that he beat the living shit out of me.

22 Q Okay. Let's go back. So you woke up in a
23 hotel room and you -- were you the only one in
24 there?

25 A At that time, yes. But when I'm at this

1 Pharma and overprescribing OxyContin to patients
2 with injuries. I mean, I kind of blame that on
3 them.

4 MR. ALLUSHI: Objection to responsiveness.

5 BY MS. FENNELLY:

6 Q Do you take any responsibility?

7 A Somewhat, yes, I do.

8 Q Did you -- you mentioned that the
9 traffickers, you know, kind of manipulated you
10 maybe with your drug addiction; is that correct?

11 A Yes, ma'am.

12 Q Is it fair to say that you often stayed
13 with them because you needed the drugs?

14 MR. TONGE: Objection.

15 A No. They used it to make me do what they
16 wanted. If I didn't do it, I wouldn't get
17 anything. And without getting anything, I could
18 not function. I literally would be shitting,
19 throwing up on myself, on the floor, in the
20 bathroom, with a terrible headache, making my skin
21 crawl. It felt like I just wanted to jump out of
22 my skin. And I'm sure if you felt like that, too,
23 you would do the same thing if you were in a
24 situation like that.

25 BY MS. FENNELLY:

1 Q Sure. So you needed the drug?

2 A I did.

3 Q And you stayed with them so that -- and
4 did what they said so that you could get the drug,
5 correct?

6 MR. TONGE: Objection.

7 A No. I did what they told me to do so I
8 could get the drug to feel okay. I didn't stay
9 with them to just have the drugs. I could have
10 gotten drugs anywhere anytime.

11 BY MS. FENNELLY:

12 Q Well, then why didn't you?

13 A Because if I tried to escape, they'd beat
14 the shit out of me.

15 Q When was the last time you talked to CB?

16 A The last time I had spoken to him was the
17 story that I was telling you a moment ago. When he
18 got back to the hotel and he noticed that I had
19 taken some of the heroin that he had in the
20 drawer -- he had always hit me before, but never
21 this bad. So he saw that I had taken some and
22 didn't listen to him and that I lied to him, this
23 was the first time that he beat me to where I
24 literally had two black eyes, a busted lip, my lip
25 was swollen like this big (indicating). He pulled

1 my hair, threw me up against the wall several
2 times, and then said he was going to take me to
3 some guy's house that was a real junkie.

4 He said, "If you want to be a junkie, I'll
5 show you what a junkie is like. Here, you want to
6 go live like one, I'm going to take you to this
7 guy's house, then you're going to really see what
8 it's like being like that."

9 He then began to tell me how this guy had
10 AIDS and all he does is shoot up all day. He's
11 like, "If that's what you want to do, then here,
12 he'll shoot you up for you. He'll give you the
13 drugs. He'll let you -- he'll snort them for you.
14 He'll give you them to smoke, whatever you want to
15 do."

16 He was like, "I can't promise you he's
17 going to be as good to you as I am, but you want to
18 live like this, here, I'll take you right to him,
19 no problem."

20 And so he's like -- and the whole time
21 we're riding in the car, he's explaining to me how
22 crazy and how horrible this guy is going to be.
23 And I'm sitting there, I'm just like, oh, my God,
24 this is crazy.

25 And then the neighborhood we happened to

1 pull into was a neighborhood that I remember
2 driving with him one time to go to his mother's
3 house where he then made me wait in the car.

4 So we pull in front of this random house,
5 and all of a sudden, he goes, "Okay, so I'm going
6 to ask you one last time, would you rather go in
7 there and get high all the time and you can just
8 get your drugs and you don't have to do what I'm
9 doing -- I don't know, he might tell you to have
10 sex with people, but he might not. He might just
11 have sex with you himself and then give you the
12 drugs -- or would you rather stay here with me?
13 Because I'm going to let you now, you got it way
14 better with me than you would ever have it with
15 him."

16 And he scared me so bad, it was almost
17 like kind of putting reverse psychology on me. And
18 so he -- I told him -- he was like, "So are you
19 going to apologize and are you never going to do
20 that again or do I need to just push you out of the
21 car and you can just go do what you want and live
22 like a junkie?"

23 And I was so scared at the time I didn't
24 know what to do. I mean, I just -- I put my head
25 down and I told him that I'm sorry and it wouldn't

1 happen again. And then we drove off.

2 And then he -- he later began explaining
3 to me, he said, "Look, I wasn't really going to
4 drop you off somewhere. That story was made up,
5 but I had to teach you a lesson. I just needed you
6 to know that you need to start acting right. And
7 when I tell you something, it goes. So I'm sorry,
8 I didn't mean to scare you or anything, but, you
9 know, sometimes you got to do that to make you
10 realize how good you have it with me where you can
11 have it so much worse."

12 I mean, that's sickening. It's like --

13 Q When was this?

14 A This was sometime between 2013 -- it
15 was -- I don't remember the exact --

16 Q So my question was -- sorry. My question
17 was, when did you see CB last? By that story, he
18 apparently tried to let you go and you decided to
19 stay with him.

20 MR. TONGE: Objection.

21 A I was getting to there.

22 BY MS. FENNELLY:

23 Q Okay.

24 A So after that whole thing had happened, I
25 got back to the room, and [REDACTED], who was there

1 number, and he just says, "[REDACTED], what, you don't
2 want to talk to me?"

3 And I keep repeating, "How did you get
4 this number?"

5 He goes, "Oh, I paid someone for it."

6 And then I hung up the phone and blocked
7 it. And then a week later -- or not, like, a week
8 later, but, like, a couple of days later, I changed
9 my number.

10 Q He didn't force you to go with him after
11 you left CB, correct? He said, "You can come with
12 me," and you chose to do that, true?

13 MR. TONGE: Objection.

14 A Yes, ma'am. Yes, ma'am, I did.

15 BY MS. FENNELLY:

16 Q So what makes that sex trafficking if you
17 chose to go with him?

18 MR. TONGE: Objection.

19 A Because I still did not want to have sex
20 with people for money. He made me do it still and
21 he made me give him all the money. And at any time
22 I wanted to leave, I was not allowed to.

23 BY MS. FENNELLY:

24 Q So how did you get away from Kwan?

25 A Through my mentor, Kasey, from 4Sarah.

1 Q Through 4Sarah. About when was that?

2 A Sometime in 2014.

3 MR. REAM: I'm sorry. Could you say that
4 number one more time, that year?

5 THE WITNESS: 2014.

6 BY MS. FENNELLY:

7 Q How were you able to get in contact with
8 Kasey?

9 A I saved her number in my phone, called her
10 whenever I was by myself. Kwan didn't have someone
11 like how CB did with Big E, so he would leave us
12 alone sometimes to go to the gas station. It was
13 very, very, very rarely but...

14 Q So you were able to go to the gas station
15 by yourself occasionally?

16 A No. I said he would go to the gas station
17 by himself and leave us at the room.

18 Q So why didn't you try to escape then?

19 A He wouldn't be gone but maybe just a few
20 minutes. The gas station is right across the
21 street from the hotels.

22 Q The next name is Justin -- I'm sorry, say
23 your last name for me one more time.

24 A [REDACTED].

25 Q [REDACTED].

1 A After the situation and everything that
2 happened, I told him what was going on during those
3 years that I was away. And he said he felt bad.
4 He didn't know that -- when he got out of prison,
5 he wished he would have stayed more better in
6 contact with me, that he would have definitely
7 tried to help. But at the time, he didn't know.
8 He was in prison. I had no way of talking to him
9 or letting him know. Plus there would have been
10 nothing he could do about it because he was in
11 prison at the time.

12 Q You guys couldn't talk on the phone when
13 he was in prison?

14 A It costs money to do that, and the
15 traffickers weren't going to give me money to pay
16 for it.

17 Q When was the last time you spoke to your
18 ex-husband?

19 A Three -- no, five years ago.

20 Q What did you speak with him about?

21 A A number of things. I'm sorry. This is a
22 touchy subject for me.

23 Q That's okay.

24 A When we got divorced, he filed for
25 divorce, and he didn't even tell me himself. He

1 MR. TONGE: Other than the advice of your
2 counsel.

3 BY MS. FENNELLY:

4 Q Other than the advice of your counsel, why
5 are you not suing other hotels?

6 I guess let me put it this way: What did
7 they do differently to the defendants in this
8 lawsuit?

9 A Some of the hotels I didn't ask for help
10 because a lot of the staff weren't really around.
11 The ones that I did see a lot, like staff members
12 that were constantly around or that I had outside,
13 like, you know, presence with, if I was able to get
14 outside and see one and I happened to approach them
15 and I asked, then that was the reason why we were
16 suing those ones.

17 Q So you're suing the defendants in this
18 lawsuit because you sought help and that wasn't
19 given to you?

20 A Right.

21 I'm sorry. Can I add to that also?

22 Q Sure.

23 A Not only that, but the hotels that I
24 stayed at, there was just so much going on there to
25 where, like, we would be there, and the reason why

1 we stayed there, because it was a comfortable spot
2 for our traffickers.

3 They knew they could get away with
4 committing those crimes there because there would
5 be other traffickers that we didn't know personally
6 that stayed there, other drug dealers. The
7 activity out there was basically somewhere you
8 could do it and get away with it because they
9 either had connections there at that hotel or it
10 was just so wide open that they knew they wouldn't
11 get in trouble or they would be warned of police
12 enforcement first.

13 I mean, I would go into these hotels and
14 you would literally see, like, guys hanging over
15 the rails keeping an eye on girls that were walking
16 in and out of the rooms. And then you would see,
17 like, customers coming in and out in, like, 15, 30
18 to hour intervals with other guys sitting in their
19 cars waiting to be next to go up.

20 And those kind of things are signs. And,
21 like, if anybody, even a normal person on the
22 street, sees something like that, it looks like
23 what it is. And for the hotel not to stop it,
24 that's not okay.

25 MR. ALLUSHI: Objection to the response.

1 Q Santa Fe, you said?

2 A San Jose, California.

3 Q San Jose. And were you primarily raised
4 in California?

5 A Up until about nine years old when my dad
6 moved out there, and my grandmother primarily
7 raised me throughout my life until I moved out
8 there to go live with my dad. It was only supposed
9 to be for like about a year, but after I moved
10 there, he decided to make it permanent. And I was
11 living with my grandmother and him off and on.

12 Q And so you lived in California from when
13 you were born to nine years old?

14 A Yeah.

15 Q Who took care of you primarily --

16 A My mother.

17 Q -- during those first nine years?

18 A My mother.

19 Q Was she using at that time?

20 A Apparently, but I didn't really have any
21 idea about it.

22 Q Do you remember her using in front of you
23 ever?

24 A No.

25 Q And then you moved to Georgia when you

1 were nine years old, correct?

2 A Yes, in fifth grade.

3 Q What do your parents do for work?

4 A My mom is a caregiver to a lady who is,
5 like, basically about to be on hospice. She helps
6 her with everything because she's got really bad
7 mobility skills, being able to, like, get around
8 and stuff like that. So she cooks, cleans for her,
9 gives her medication, helps her in the shower so
10 she can take a bath, stuff like that.

11 Other than that, I don't know if she has
12 another job. I think that's the only one she has
13 right now.

14 Q What was her job when you were growing up
15 with her, from a baby to nine?

16 A She worked for marketing firms. She
17 worked as an admin, you know, administration
18 assistant at different companies. She had a lot of
19 office jobs.

20 Q Was she pretty well able to provide for
21 you financially with those jobs?

22 A Oh, yeah.

23 Q You didn't struggle with, like, money
24 growing up?

25 A I mean, not any more than, you know, a

1 BY MS. FENNELLY:

2 Q Okay. So we were talking about when you
3 first were allegedly sex trafficked in Atlanta.

4 A Correct.

5 Q Which was around, I think, March of 2013;
6 is that right?

7 A Correct, that's when it started, yeah.

8 Q Okay. When was the first time you stayed
9 at the Red Roof Smyrna?

10 A That's really hard to narrow down the
11 month, but that's when -- the reason why I would go
12 there is because, like I said, Kwan would have
13 stuff to do with family, maybe appointments he had
14 to go to that I wasn't allowed to go with him and
15 accompany on.

16 So because he still wanted me to be making
17 money and working and stuff like that, he would
18 drop me off to [REDACTED] and [REDACTED]. That was the
19 girl that he was trafficking out of the Red Roof
20 Smyrna. And in order for me to be able to stay
21 there, whatever money I made, I had to give half to
22 Ant and then the other half to Kwan. So there --

23 MR. ALLUSHI: Objection.

24 Nonresponsiveness.

25 A There was -- there wasn't, like, a whole,

1 whole, whole bunch of times. But if you had to
2 say, like, the number of times that I was there,
3 maybe like 30 or more because I wasn't there as
4 often as I was at the Red Roof North Druid Hills.
5 That was one that I frequented the most.

6 MR. TONGE: Could I just jump in to try
7 help something?

8 MS. FENNELLY: Sure.

9 MR. TONGE: Did you go to Smyrna with CB?

10 THE WITNESS: No, just Kwan.

11 MR. TONGE: How long were you with CB
12 before you were with Kwan?

13 THE WITNESS: I was with CB for a good, I
14 would say, close to maybe eight months, maybe less.

15 MR. TONGE: Okay. So if you get with CB
16 and -- okay. So maybe --

17 BY MS. FENNELLY:

18 Q So this alleged trafficking started in
19 March of 2013, correct?

20 A Correct.

21 Q And that was with CB?

22 A Yes, ma'am.

23 Q And you were with CB for about eight
24 months?

25 A Give or take, yes.

1 Q At which point, you never went to the RRI
2 Smyrna?

3 A Not yet.

4 Q Not yet. So it would have been probably
5 in 2014 that you went to the RRI Smyrna for the
6 first time with Kwan?

7 A Yes.

8 Q Okay. Did you ever stay at the RRI Smyrna
9 before December of 2012?

10 A I don't think so, no.

11 Q And you said you stayed there about 30
12 times maybe?

13 A Yes.

14 Q How many nights would you stay there each
15 time?

16 A There was only a couple of times that I
17 stayed there overnight, but mainly he would drop me
18 off, like, early in the day and I'd stay, you know,
19 all day and then he'd pick me back up.

20 Q Okay. How many johns would you see each
21 day?

22 A Well, considering the fact that me and
23 Megan were in the same room, I mean, if you're
24 asking just about me, I mean, it could be anywhere
25 from 10 or more, and then including the people

1 she's seeing, and she's seeing way more people than
2 I did.

3 Q Why was it that she saw more people than
4 you?

5 A She did other -- she did things and dates
6 that I wouldn't do. And I know girls offered
7 different things and stuff like that, so...

8 Q Can you be more specific about that?

9 A As far as like offering maybe anal sex, a
10 thing called GFE experience, which is like
11 girlfriend experience where, like, basically you
12 are kissing and all kinds of stuff like that, like
13 really acting more like a boyfriend/girlfriend
14 situation.

15 Q I'm sorry. What was the -- there was an
16 acronym.

17 A GFE, it's called girlfriend experience.

18 Q GFE?

19 A Uh-huh.

20 Q What was the highest number of johns that
21 you saw in one day at Smyrna?

22 A Probably like maybe 15.

23 Q And would that be every day or were there
24 days that were more busy than others?

25 A Definitely.

1 Q Okay. So you didn't speak to any other
2 Red Roof employees about the trafficking?

3 A Except for Forrest.

4 Q Except for Forrest. Who are the other
5 employees that you spoke to, do you know, just
6 generally spoke to?

7 A I mean, I couldn't remember. I don't -- I
8 don't -- I didn't get really anyone else's names.

9 Q Why didn't you tell them that you were
10 allegedly being trafficked?

11 A To be perfectly honest, I figured they
12 might have known about it because of Forrest doing
13 what he was doing. I mean, if Forrest is doing
14 what he was doing, why wouldn't the other employees
15 know?

16 Q Did you ask for help?

17 A Not from them, but from Forrest, yeah.

18 Q Why didn't you ask for help from them?

19 A Because I've learned that asking for help
20 got me in a lot of trouble. There had been a few
21 times that I did ask for help, and I got the living
22 crap beaten out of me for it.

23 Q So you never asked a Red Roof employee for
24 help?

25 A Not at the Smyrna location, no.

1 multiple hours, obviously, the price went up from
2 there.

3 Q What was the most you ever made from one
4 session?

5 A An overnight for \$1,000.

6 Q Have you ever called Red Roof corporate to
7 report the things that you allege happened at the
8 Red Roof Smyrna?

9 A No, ma'am.

10 Q Okay. Now I'm going to go through similar
11 questions, but now we're going to talk about the
12 North Druid Hills Red Roof.

13 A Okay.

14 Q When was the first time you were at the
15 North Druid Hills location?

16 A I stayed there both with CB and Kwan. So
17 it could have been anywhere, you know, in -- from
18 March to the end of it. Like I said, I can't
19 really remember specific dates or stuff, but I did
20 use my own ID to check in there.

21 Q So when you say "the end of it," you mean
22 towards the end of 2014?

23 A Yes, ma'am.

24 Q And you did -- you said you did use your
25 own ID to check in?

1 A Uh-huh.

2 Q Did you tell the person at the front desk
3 that you were there against your will?

4 A No, I did not.

5 Q Why?

6 A Like I said, I didn't know who was working
7 for my trafficker and who wasn't. I learned very
8 early on that that wasn't the thing to do because
9 I've had guys that -- and women that I talked to
10 that I asked for help that would go back and tell
11 my trafficker, and I did not want to get beat up
12 again. I was scared for my life.

13 Q So you didn't tell any employees at the
14 North Druid Hills location that you were being
15 forced to engage in commercial sex?

16 A No. Because before staying there, the
17 ones that I did try to before at the other hotels
18 that I stayed at where I did ask for help, that's
19 what happened to me. And so after that, I just --
20 I gave up on asking for help because I felt like it
21 wasn't going to even work.

22 Q Which other hotels did you ask for help
23 at?

24 A Suburban Extended Stay, I believe I asked
25 or have spoken to somebody about it at the

1 A No, ma'am.

2 Q Did you ever call Red Roof corporate to
3 report the things that happened at the North Druid
4 Hills location?

5 A I've never called corporate at any of the
6 hotels.

7 Q How many times did you stay at North Druid
8 Hills approximately?

9 A I couldn't tell you approximately. But if
10 you want to say the four that I'm suing now, I can
11 give you, like, the order of how many times I
12 stayed there, more at which ones, because there was
13 a circle of them that I stayed at the most.

14 Q Sure.

15 A So the Suburban Extended Stay was the one
16 I frequented the most, then it was the Microtel,
17 and then it was North Druid Hills and then Smyrna,
18 in that order. Not including the other ones that
19 I'm not suing, but some of those might have been
20 more than those four, but just in this lawsuit,
21 that's the order of the -- how much I stayed at.

22 Q So you said Smyrna was about maybe 30
23 times you stayed there?

24 A Yeah.

25 Q So North Druid Hills would be more than

1 that?

2 A Way more.

3 Q Like 50 times?

4 A Maybe even more than that. You have to
5 think I was there for a whole year and I lived
6 in -- lived in hotels, you know, so...

7 Q 100 times?

8 A Could be.

9 Q How many days would you stay there each
10 time?

11 A At least three days. I don't think I
12 stayed there more than three days at a time.

13 Q And how many johns would you see at the
14 North Druid Hills location each day?

15 A It could be anywhere from 1 to 20, maybe
16 more.

17 Q 20 a day?

18 A Yeah, sometimes it was like that. You
19 have to think these guys would come, right, and
20 some of them might be seeing me for 15 minutes.
21 And you got guys calling you all day long. And
22 literally what happens is, like, you're having a
23 date, and you book a certain time, and then you
24 also have to book the other guy, you tell him what
25 time.

1 But there might be four or five guys in
2 the parking lot waiting for their turn. And like
3 literally one guy is walking out, and the next guy
4 is walking in. One guy is walking out, and the
5 next guy is walking in. You literally don't even
6 get a break. It's like literally back to back to
7 back to back.

8 So that's what I don't get is, like, how
9 people didn't know that this was going on.
10 Especially when the girls' rooms that these guys
11 were going in and out of, like, literally a couple
12 of doors down are these, you know, men that don't
13 look like they're just regular men because, you
14 know, a lot of guys that either sell drugs or are
15 pimps, they dress and look, you know, kind of a
16 certain way. They have that kind of like thug look
17 to them, you know?

18 And so they're standing out there kind of
19 keeping an eye out on this room, making sure that
20 everything is going like, you know, like it's
21 supposed to. Making sure the girls aren't getting
22 out of hand or maybe the, you know, the johns
23 aren't trying to rob them or do anything like that.
24 Make sure they're getting their money in. So you
25 see them constantly looking.

1 And then girls are coming out looking a
2 certain type of way. And so, I mean, it would be
3 crazy not to notice that stuff. And it was like
4 that a lot. I mean, it was one of the reasons why
5 we stayed at the Red Roof because we knew we could
6 get away with it.

7 Q When you were at either of the Red Roof
8 hotels, would you typically have the blinds open or
9 closed?

10 A I mean, they were closed. We might open
11 them when no one is in there, but definitely when
12 there are customers in there, they would be closed.

13 Q Would you use the Do Not Disturb signs on
14 the door?

15 A Of course.

16 Q Did you hide from police officers when
17 they would come ever?

18 A Only when the people that were working
19 there called and told us to.

20 Q But you would try to flee the police?

21 A No, we would stay inside the room. Like,
22 for example, Forrest would call Ant and say, "Hey,
23 there's something going on over here in another
24 room. Cops are about to show up. Lay low for a
25 minute. Don't have no customers come by."

1 And then as soon as the altercation or
2 whatever was going on and the police left, he would
3 call and say, "Okay. Everything is good. Go ahead
4 and continue on."

5 Q So you'd hide in your room when you knew
6 the police were coming?

7 A Uh-huh.

8 MR. ALLUSHI: Is that a yes?

9 A Yes. I'm sorry.

10 BY MS. FENNELLY:

11 Q When you were outside of your room, what
12 were you wearing?

13 A Regular clothes. I didn't dress, like,
14 super skimpy or anything like that unless I was
15 inside the room, lingerie, something like that, but
16 I wouldn't walk out looking like that. I was never
17 asked to, like, work outside or try to flag down
18 johns. Like, I guess they would say working the
19 track is kind of the term they would use for girls
20 that walked down the streets to try to find guys.

21 So really I was not trying to draw too
22 much attention to myself, especially because our --
23 one major rule of having the girls and your pimps,
24 if you make any eye contact with another pimp,
25 basically that tells that pimp that they could take

1 you from your trafficker. So we were always told
2 to keep our heads down and look straight at the
3 ground, because if we did that, we would either get
4 in major trouble for it, we could get beaten up, or
5 this guy could literally just snatch us up and take
6 us into his room and basically tell the other pimp,
7 like, oh, she's mine now, she chose up because she
8 looked at me.

9 Q I want to go into more -- so from March of
10 2013 to the end of 2014, did you have commercial
11 sex every day?

12 A Basically, yeah.

13 Q Multiple times a day?

14 A Well, of course, multiple times a day.

15 Q With at least 15 people a day?

16 A Or more. It could be less. Sometimes
17 there are days that were less, but it was always
18 multiples. Very, very rarely would we ever maybe
19 just see one person.

20 But if I'm not seeing one person, there's
21 other girls. You've got to think sometimes, we had
22 five girls in the room. So I might -- I might see
23 two, but the other girls in there might have way
24 more than that. So regardless if I'm seeing
25 multiples or not, the other girls are. There was

1 you charge twice a day in a row. But like I said,
2 if you're on the right dosage, you should be able
3 to go 24 hours without getting sick, so...

4 Q And are you usually able to go 24 hours
5 without being sick? Is that -- is that tried and
6 true?

7 A Oh, yeah, definitely.

8 Q Okay. And your family's bringing
9 medication right now for your migraine. What's the
10 name of it?

11 A Imitrex.

12 Q Can you spell that or try to?

13 MR. KEITH: I can. I-m-i-t-r-i-x --
14 t-r-e-x.

15 A Yeah, it basically just sounds how it's
16 spelled.

17 BY MS. FENNELLY:

18 Q Imitrex, okay.

19 MR. KEITH: Yeah, it's I-m-i-t-r-e-x.

20 BY MS. FENNELLY:

21 Q Okay. When were you first prescribed that
22 medication? Is it a -- it's a prescription,
23 correct?

24 A Yes. I mean, I've suffered from migraines
25 my whole life. I was diagnosed with them when I

1 was 13. And the first time I was ever prescribed
2 it, I think I was about 16 years old. I had gone
3 through several medications to try to find what
4 worked, and that was the only one that really
5 stuck. And it's just an as-needed thing. I don't
6 take it every day.

7 Q How often do you take it?

8 A Let me see. I probably get a migraine out
9 of the month a good 12 times.

10 Q 12 times out of the month?

11 A Yeah. It sucks.

12 Q So almost half of the time you have a
13 migraine?

14 A They're sometimes worse than other days.
15 I've been hospitalized for them a lot, too.

16 Q You've been hospitalized for them?

17 A Yeah.

18 Q About how many times?

19 A My whole lifetime, maybe like, give or
20 take, maybe 20 times.

21 Q What dosage is your Imitrex?

22 A I forget. I know -- alls I know is
23 they're these little, like, oblong, rectangular
24 orange pills. And I think the other ones are,
25 like, different colors as the milligrams goes on.

1 CERTIFICATE

2 STATE OF GEORGIA:

3 COUNTY OF FULTON:

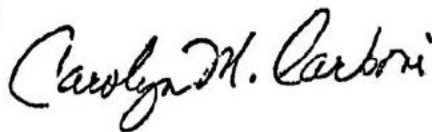
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10 I further certify that I am not a relative
11 or employee or attorney of any party, nor am I
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14 I have no relationship of interest in this
15 matter which would disqualify me from maintaining
16 my obligation of impartiality in compliance with
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18 I have no direct contract with any party
19 in this action and my compensation is based solely
20 on the terms of my subcontractor agreement.

21 Nothing in the arrangements made for this
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23 all parties as an impartial officer of the court.

24 

25 CAROLYN M. CARBONI, RPR, RMR, CCR-B-878